

July 12, 2004

Mr. Donald S. Welsh
Regional Administrator
EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Mr. Welsh:

Pursuant to Section 181(a) (4) of the Clean Air Act and on behalf of the Governor of the Commonwealth of Virginia, I am hereby submitting a formal petition for consideration to EPA Region III. The purpose of this petition is request that EPA reclassify the Richmond area from a moderate to marginal nonattainment area under the 8-hour Ozone National Ambient Air Quality Standard (NAAQS). Such a request is allowed by the Act if the design value in an area is within five percent (5%) of the lower classification level. Specifically, in the case of the Richmond area, the current design value is 94 parts per billion which is within the allowed 5% range for reclassification consideration.

Enclosed is a detailed technical analysis document developed to support this petition and request. This document contains analyses of monitoring, modeling, and emissions data for the Richmond area. In summary, these analyses support the reclassification request in that:

- Monitoring data and trends in the area are mainly indicative of a marginal ozone nonattainment area.
- Various DEQ and EPA modeling exercises indicate that the area is likely to attain the 8-hour ozone as soon as 2007.
- An emissions analysis indicates that substantial emission reductions will be achieved in the area by 2007.

We believe that this document presents a compelling case to support the reclassification of the Richmond area to the lower marginal nonattainment classification.

Thank you for the opportunity submit this petition and for your consideration of this request. Please contact me if you have any questions concerning this petition and supporting information.

Sincerely,

Robert G. Burnley

Enclosure

Donald S. Welsh
July 12, 2004
page two, Virginia Ozone Reclassification Letter

cc: W. Tayloe Murphy, Jr.
Judith Katz
John M. Daniel, Jr.